



State of Tennessee  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243-1102

March 19, 2014

Mr. Doug Dowdy  
Owner/Manager  
Dowdy Pork, LLC  
4855 Old Jackson Road  
Somerville, TN 38068

Subject: **Permit Tracking No. SOPCD0017**  
**Dowdy Pork, LLC**  
**Somerville, Fayette County, Tennessee**

Dear Mr. Dowdy:

On behalf of the Division of Water Resources (division), the Tennessee Department of Agriculture (TDA) received your permit application on September 26, 2011. TDA has reviewed your application and has notified you of the results of their review in a letter dated January 15, 2014. The division has reviewed your application information to determine the status of the receiving waters closest to your manure storage pond. The division determined that the receiving stream, Catron Creek, has unavailable conditions for *Escherichia coli* (*E. coli*), among other things. *E. coli* is a pollutant found in manure and the state uses it as indicator of recent fecal (human or animal waste) contamination in water. This means that the *E. coli* levels in Catron Creek are at an unsafe level and the division cannot allow permittees to worsen this problem. If the division has not developed a TMDL (which is basically a plan for what the division is going to do to reduce the amount of the *E. coli* in the stream), the permit that you have applied for requires that you certify that the best management practices (BMPs) that you have selected to use on your farm are the most appropriate practices that you can do to reduce *E. coli* in discharges from your farm and that your selected BMPs are designed and will be implemented to minimize contributions of *E. coli* to the stream from your farm.

Therefore, in addition to a complete nutrient management plan that has been approved by TDA, before we will be able to issue your CAFO permit coverage you will need to submit a signed and dated certification statement which states:

I certify that the control measures or best management practices selected for my facility are the most appropriate for the reduction of pollutants at my facility and these treatment methods and control measures are designed, and will be implemented to effectively minimize contributions of pollutants of concern. I understand that a failure to implement treatment methods and control measures so as to minimize contributions of those pollutants will be a violation of my permit.

If you have questions, please contact the Memphis Environmental Field Office at 1-888-891-TDEC; or, at this office, you may contact me at (615) 532-5367 or by E-mail at *Brad.Harris@tn.gov*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Harris", with a stylized flourish at the end.

Brad C. Harris, P.E.  
Manager, Land-Based Systems

cc: Permit File  
Memphis Environmental Field Office